

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,

STATE OF ILLINOIS, and

STATE OF MINNESOTA,

Plaintiffs,

v.

GTCR, LLC,

GTCR BC HOLDINGS, LLC, and

SURMODICS, INC.,

Defendants.

Case No. 1:25-cv-02391

Hon. Jeffrey I. Cummings

**JOINT MOTION FOR ENTRY OF [PROPOSED]
STIPULATED ORDER CONTINUING MOTION TO DISMISS DEADLINE**

Plaintiffs Federal Trade Commission (“FTC”), the State of Illinois, and the State of Minnesota, (collectively, “Plaintiffs”) and Defendants GTCR, LLC, GTCR BC Holdings, LLC, and Surmodics, Inc. (collectively, “Defendants,” together with Plaintiffs, the “Parties”) respectfully request that the Court enter their [Proposed] Stipulated Order continuing the deadline for Defendant GTCR, LLC to respond to the Amended Complaint and setting a briefing schedule for GTCR, LLC’s forthcoming motion to dismiss that reflects the agreement of the parties. In support, the Parties state the following:

1. Plaintiffs filed their Amended Complaint adding GTCR, LLC as a Defendant on April 16, 2025 (ECF No. 66).

2. The Scheduling Order provides that Defendant GTCR, LLC will respond to the Amended Complaint by June 16, 2025 (ECF No. 100).
3. Counsel for GTCR, LLC reserves the right to file a motion to dismiss the Amended Complaint.
4. The Parties have conferred and agree to continue the deadline for GTCR, LLC to file a response to the Amended Complaint until June 30, 2025.
5. The Parties also agree that Plaintiffs' response brief to any motion to dismiss shall be due 30 days after the motion to dismiss is filed, and any reply brief shall be due 14 days after the filing of the response brief.

Dated: June 16, 2025

/s/ Marguerite M. Sullivan

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Respectfully submitted,

/s/ Maia Perez (with consent)

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served electronically through this Court's electronic service system upon all parties and/or counsel of record on June 16, 2025. Notice of this filing is sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Marguerite M. Sullivan
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